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TO BE FILED UNDER SEAL

BY EMAIL

The Honorable Jed S. Rakoff
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

July 14, 2022

SEALING

AP ENCL - 8/11/22

[Order otherwise granted]

Re: United States v. Sequan Jackson; 22 Cr. 352 (JSR)

Dear Judge Rakoff:

I represent Sequan Jackson in the above-referenced matter, having been appointed pursuant to the provisions of the Criminal Justice Act (“CJA”), 18 U.S.C. § 3006A on June 28, 2022. I write to respectfully request the appointment of Kestine Thiele, as associate counsel to assist in the representation of Mr. Jackson and to prepare his defense for trial. Given the volume of discovery and complexities associated with this matter, Ms. Thiele’s assistance is critical and important.

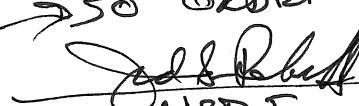
Mr. Jackson is facing serious charges and serious penalties if he is convicted of the charges filed against him. Additionally, discovery is voluminous and relates to a 3-year period in which Mr. Jackson and his co-defendants allegedly engaged in a racketeering conspiracy and extortion conspiracy. As reported by the Government, such discovery consists of Title III intercepted phone calls over a 2-month period, content from numerous cell phones and other electronic devices, search warrant applications and returns, law enforcement reports, financial records and other items. Ms. Thiele’s assistance is needed to assist in the review and organization of the discovery, and consultation with Mr. Jackson. These are important tasks for both trial preparation and negotiations with the Government concerning a resolution. Such efforts are also needed as I also have other important matters, including a trial before Judge Hellerstein that is scheduled to commence on August 29, 2022, as well as a demanding schedule for the remainder of 2022 and a 4-week long murder trial scheduled to commence before Judge Matsumoto on January 23, 2023 in the Eastern District of New York.

Ms. Thiele graduated from the University of Southern California’s Marshall School of Business and is a graduate of Fordham Law School. While in law school, she devoted

significant time to criminal practice, both at the state and federal levels. She participated in a Federal Litigation Clinic where she shared in the representation of six defendants while under the supervision of two CJA Panel members. Excelling in her work, she earned the Archibald R. Murray Public Interest Award, and the Ann Moynihan Award for outstanding clinical performance. Ms. Thiele was also a *Kirpalani* Public Interest Fellow and a member of the Fordham Urban Law Journal. Additionally, during law school she was appointed as a paralegal in a sex-trafficking case before Judge Engelmayer in the Southern District of New York – *United States v. Justin Rivera*; 19 Cr. 131 (PAE). The case was tried last year and lasted two weeks. Ms. Thiele's efforts were instrumental in both the pre-trial and trial phases. Her work in the *Rivera* matter continues to be important as we prepare for sentencing. Ms. Thiele is assisting me in other CJA and private federal criminal matters, including a death-eligible case in the Eastern District of New York – *United States v. Cory Martin*; 20 Cr. 549 (AMD). Ms. Thiele has also worked extensively with members of the CJA Panel and is now employed as an associate at my firm. Her resume is attached for Your Honor's review.

Accordingly, I respectfully request that the Court authorize the appointment of Kestine Thiele, as associate counsel and that she be permitted to bill at the rate of \$110/hour. Because Ms. Thiele began working on the case at my request on June 28, 2022, I also request that her appointment be *nunc pro tunc* to June 28, 2022. Finally, due to the time and effort this case has required and will continue to require, I request that Ms. Thiele be permitted to file interim vouchers.

Thank you for your consideration.

250 ORDERED

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Respectfully submitted,

/s/

Anthony Cecutti